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**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW, Suite TW-A325  
Washington, DC 20554

**EB Docket No. 06-36**

**Re: CERTIFICATION OF CPNI COMPLIANCE FILING – January 22, 2010**

North Dakota Long Distance, LLC      499 Filer ID # 809521

Dear Ms. Dortch:

On behalf of the telecommunications carrier listed above, John Staurulakis (JSI), their consultant is filing the attached CPNI Certification together with the statement of procedures for operational compliance with FCC's CPNI rules.

Sincerely,

A handwritten signature in black ink that reads 'John Kuykendall'.

John Kuykendall  
Vice President  
[jkuykendall@jsitel.com](mailto:jkuykendall@jsitel.com)

Attachment

cc: Best Copy and Printing, Inc. *via email to [fcc@bcpiweb.com](mailto:fcc@bcpiweb.com)*

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9430 Research Boulevard, Austin, Texas 78759  
Phone: 512-338-0473  
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*Eagandale Corporate Center, Suite 310  
1380 Corporate Center Curve  
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Phone: 651-452-2660  
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*547 South Oakview Lane  
Bountiful, UT 84010  
Phone: 801-294-4576  
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*6849 Peachtree Dunwoody Road  
Building B-3, Suite 300  
Atlanta, Georgia 30328  
Phone: 770-569-2105  
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"Your Global Connection"

# NORTH DAKOTA LONG DISTANCE

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## NORTH DAKOTA LONG DISTANCE, LLC

P.O. Box 857, Devils Lake, ND 58301 (701) 662-7350

### Annual 47 C.F.R. § 64.2009(e) CPNI Certification

#### EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2009

Date signed: January 20, 2010

Name of Company Covered by this Certification:

North Dakota Long Distance, LLC

499 Filer ID

809521

Name of signatory: Juli Schafer-DeVier

Title of signatory: General Manager

I, Juli Schafer-DeVier, certify that I am an officer of the company named above ("Company"), and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission ("Commission"). See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2009. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with Commission rules.

Attachment

LOCALLY OWNED BY

Reservation Telephone Co-op, Parshall, ND 1-888-862-3115 • Dakota Central Co-op, Carrington, ND 1-800-771-0974 • Polar Communications, Park River, ND 1-800-284-7222  
United Telephone, Langdon, ND 1-800-844-9708 • North Dakota Telephone Company, Devils Lake, ND 1-800-880-4213 • Midstate Telephone, Stanley, ND 1-800-523-5436  
Dickey Rural Telecomm., Ellendale, ND 1-800-342-4551 • BEK Communications Co-op, Steele, ND 1-888-475-2361 • Northwest Communications, Ray, ND 1-800-245-5884  
MLGC, Enderlin/Cooperstown, ND 701-437-3300 or 701-797-3301

**NORTH DAKOTA LONG DISTANCE, LLC**  
**499 Filer ID No. 809521**  
**P.O. Box 857, Devils Lake, ND 58301 (701) 662-7350**

**2009 ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE**  
**January 20, 2010**

This statement accompanies the Company's 2009 Customer Proprietary Network Information ("CPNI") Certification, as required by Section 64.2009(e) of the Federal Communications Commission's ("FCC's") rules, for the purpose of explaining how the operating procedures of the Company ensure compliance with Part 64, Subpart U of the FCC's rules. *See* 47 C.F.R. § 64.2001 *et seq.*

*All subsequent references to rule Sections refer to rules under Part 64, Subpart U unless indicated otherwise.*

**1. Single Category of Telecommunications Service**

The Company's service is limited to the interexchange category of telecommunications service. The Company uses CPNI derived from provision of interexchange service for marketing interexchange services to its interexchange service subscriber base, including current and former customers. Because the Company does not market services outside interexchange service, the Company has not undertaken Opt-Out or Opt-In Notification.

**2. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the Section 64.2003(g) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

**3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under Section 64.2005.

**4. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under Section 64.2007.

**5. Procedures Protecting Against Disclosure of CPNI**

The Company has implemented procedures for compliance with new Section 64.2010 including, but not limited to the following:\*

Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits.

The Company does not provide customers with on-line access to customer account information.

The Company has implemented procedures to provide immediate notification to customers of account changes, including changes in address-of-record and attempts at access to CPNI through use of back-up methods due to forgotten passwords.

**6. Actions Taken Against Data Brokers and Responses to Customer Complaints**

Pursuant to Section 64.2009, the Company makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

<u>Not applicable.</u>	No actions taken against data-brokers.
	No customer complaints received.

**7. Disciplinary Process**

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under Section 64.2009(b).

**8. Supervisory Review Process for Outbound Marketing**

The Company has a supervisory review process to ensure compliance with Section 64.2009(d) of the FCC's Part 64, Subpart U CPNI rules as well as related record-keeping pursuant to Section 64.2009(c).

**9. Procedures for Notifying Law Enforcement of CPNI Security Breaches**

The Company has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related record-keeping and deferred notification to customers.